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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,) CR. NO. S-04-442 WBS
12)
Plaintiff,) STIPULATION AND [PROPOSED] ORDER
13) CONTINUING STATUS CONFERENCE AND
v.) EXCLUDING TIME
14)
AMIR NOSHIN,) Date: August 3, 2005
15) Time: 9:00 a.m.
Defendant.) Crtrm: Hon. William B. Shubb
16)
_____)

17 Plaintiff, United States of America, by and through Assistant
18 U.S. Attorney Robin R. Taylor, and defendant Amir Noshin, by and
19 through counsel, Johnny L. Griffin, III, Esq., hereby STIPULATE AND
20 AGREE to continue the status conference set for June 29, 2005, to
21 August 3, 2005.

22 The parties have further AGREED AND STIPULATED that time should
23 be excluded from June 29, 2005, through and including August 3,
24 2005, to provide defense counsel reasonable time to prepare pursuant
25 to the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(B)(iv) [Local Code
26 T4]. The defense has requested a continuance, and it is justified,
27 because the case (1) involves a complex access device fraud scheme;
28 (2) defense counsel, who was just recently substituted into the

1 case, needs additional time to evaluate the case and review
2 discovery; (3) the defense needs additional time to evaluate
3 information recently obtained by the parties; and (4) the parties
4 need additional time to discuss case resolution. The defendant is
5 in custody.

6 DATED: June 30, 2005

McGREGOR W. SCOTT
United States Attorney

8 By: /S/ Robin Taylor
ROBIN R. TAYLOR
9 Assistant U.S. Attorney

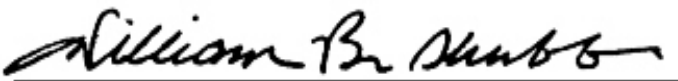
10
11 DATED: June 30, 2005
12 _____

By: /S/ Johnny L. Griffin, III
JOHNNY L. GRIFFIN, III, ESQ.
Attorney for Amir Noshin

13
14 **ORDER**

15 **IT IS SO ORDERED.**

16 DATED: June 30, 2005

17 
18 WILLIAM B. SHUBB
19 UNITED STATES DISTRICT JUDGE